

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION

UNITED STATES OF AMERICA

VS.

CRIMINAL NO. 4:15cr50-SA-JMV

MICHAEL ALLEN TARVER

DEFENDANT

RESPONSE TO MOTION FOR PROTECTIVE ORDER

COMES NOW, the Defendant, Michael Allen Tarver, by and through counsel, files this his Response to Motion for Protective Order that was filed by counsel for Boyle Skene Water Association. In support thereof, Defendant would show the following:

1. The primary objection in the Motion for Protective Order is that any disclosure under the subpoena at issue may impact civil litigation in the cause of Michael Tarver vs. Boyle-Skene Water Association, *et al.*
2. Michael Tarver is the defendant on the above styled cause, his interest in the requested information is for purposes of establishing the motive of Boyle Skene Water Association to pursue false allegations against him and to establish the approximate date when governmental involvement began triggering certain constitutional restrictions.
3. The release of the requested information under a gag order prohibiting undersigned counsel from disseminating or in anyway disclosing any information pursuant to the subpoena to anyone without the Order of this Court would protect the concerns set out in the Motion for Protective Order.
4. The information is absolutely essential if Michael Tarver, as a criminal defendant, is going to be guaranteed his rights to a fair trial. Due process, effective assistance of counsel and all other rights set out under the Fourth, Fifth, Sixth and Eighth

amendments of the United States Constitution.

Respectfully submitted this the 8th day of October, 2015.

Respectfully submitted,

MICHAEL ALLEN TARVER

By: /s/ Cynthia A. Stewart
CYNTHIA A. STEWART

SUBMITTED BY:

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CERTIFICATE OF SERVICE

I, Cynthia A. Stewart, do hereby certify that I have this day caused to be filed a true and correct copy of the foregoing document using the Court's CM/ECF system, which sent a true and correct copy of the same to all counsel of record.

SO CERTIFIED, this the 8th day of October, 2015.

/s/ Cynthia A. Stewart

Cynthia A. Stewart